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6 Attorneys for Plaintiffs

7 UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 RUSSELL E. BURNS, et al.,

10 Plaintiffs,  
11 v.

12 MERIDIAN ASSOCIATES, INC., a California  
Corporation,

13 Defendant.

Case No.: C13-4298 PJH (NC)

**PLAINTIFFS' REQUEST TO  
CONTINUE HEARING ON MOTION  
FOR DEFAULT JUDGMENT; and  
[PROPOSED] ORDER THEREON**

Date: May 14, 2014

Time: 1:00 p.m.

Ctrm: A, 15th Floor

450 Golden Gate Avenue

San Francisco, California

Judge: The Honorable Magistrate Judge  
Nathanael M. Cousins

17 Plaintiffs respectfully request that the hearing on their Motion for Default Judgment,  
18 currently scheduled for May 14, 2014, be continued for approximately twenty (20) days to June 4,  
19 2014. Good cause exists to continue the hearing as follows:

- 20 1. Plaintiffs and Defendant recently reached an informal resolution of this matter.
- 21 2. Defendant informed Plaintiffs that its settlement payment had been mailed to  
22 Plaintiffs the evening of May 5, 2014.
- 23 3. Plaintiffs received Defendant's settlement payment at the close of business on  
24 Thursday, May 8, 2014.
- 25 4. Upon confirmation of bank clearance of Defendant's payment, which typically  
26 takes approximately two (2) weeks from the date of deposit, Plaintiffs intend on filing a voluntary  
27 dismissal of this action.
- 28

1           5.       Therefore, Plaintiffs respectfully request that the Court continue the hearing on  
2 their Motion for Default Judgment, currently on calendar for May 14, 2014, for approximately  
3 twenty (20) days to June 4, 2014.

4 Dated: May 9, 2014

**SALTZMAN & JOHNSON  
LAW CORPORATION**

6 By: \_\_\_\_\_/S/  
7 Erica J. Russell  
Attorneys for Plaintiffs

8 IT IS SO ORDERED.

9           Based on the foregoing, and good cause appearing, the currently set hearing on Plaintiffs'  
10 Motion for Default Judgment is hereby continued to June 4, 2014 at 1:00 p.m.

11 Date: May 9, 2014



PROOF OF SERVICE

I, the undersigned, declare:

I am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On **May 9, 2014**, I served the following document(s) on the parties to this action in the manner described below:

**PLAINTIFFS' REQUEST TO CONTINUE HEARING ON MOTION FOR DEFAULT JUDGMENT; and [PROPOSED] ORDER THEREON**

XX **MAIL**, being familiar with the practice of this office for the collection and the processing of correspondence for mailing with the United States Postal Service, and deposited in the United States Mail copies of the same to the business addresses as specified below, in a sealed envelope fully prepared.

*To:*

**Meridian Associates, Inc.  
1470 Enea Circle, Suite 1750  
Concord, CA 94104**

**Meridian Associates, Inc.  
c/o Thomas Joseph Bomben, Agent for Service of Process  
1530 Eastwoodbury Lane  
Martinez, CA 94553**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 9th day of May, 2014, at San Francisco, California.

/S/

Alicia Rutkowski